Proposed Action: Slatt-John Day Transmission Tower 3/1 Guardrail Installation

Project No.: 395569

Project Manager: Donna Martin - TELF-TPP-3

Location: Gilliam County, OR

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): Routine maintenance

Description of the Proposed Action: BPA proposes to install an overall 93-foot long guardrail and barrier wall along Rattlesnake Road located at the base of the Slatt – John Day No.1 lattice-steel transmission tower 3/1. The guardrail would help protect both the transmission tower and drivers on the road as one of the tower legs is located immediately adjacent to the road.

At the center of the guardrail BPA would install a 12-foot concrete barrier wall protecting the most exposed leg. General construction would include 8 inch x 8 inch wood blocks or metal posts approximately 31 inches above the ground and 41 inches deep at a 1 foot, 3 foot & 6 foot intervals throughout the length of the guardrail.

During construction the work vehicles would be staged either on the graveled shoulder or on the paved portion of the road. Traffic controls (Flaggers and signage for work and lane closure) for safety would be in place during the entire project. The construction phase would take approximately 2 weeks to complete. Construction contractors would stockpile construction materials in the immediate area and in the surrounding area. The guardrail installation would be done in late summer or fall of 2017.

Findings: In accordance with Section 1021.410(b) of the Department of Energy’s (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

(1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
(2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
(3) has not been segmented to meet the definition of a categorical exclusion.
Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ John Wiley  
John Wiley  
Physical Scientist (Environmental)

Concur:

/s/ Stacy L. Mason  
Stacy L. Mason  
NEPA Compliance Officer  

Date:  August 11, 2017

Attachment(s): Environmental Checklist
Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

**Proposed Action:** Slatt-John Day Transmission Tower 3/1 Guardrail Installation

**Project Site Description**

The work would be conducted on and adjacent to Rattlesnake Road at the base of the transmission line tower 3/1. The guardrail installation area is within the Rattlesnake wind farm, with flat terrain and sparse vegetation. Construction activities and vehicle staging would occur within the Rattlesnake Road prism (the pavement and road shoulder). Construction materials would be stockpiled adjacent to the road and transmission tower.

**Evaluation of Potential Impacts to Environmental Resources**

<table>
<thead>
<tr>
<th>Environmental Resource Impacts</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
<td>✓</td>
<td></td>
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</tbody>
</table>

**Explanation:**

BPA has determined the undertaking does not have the potential to cause effects on historic properties. (Brian O'Donnachadha 7/27/17)

In the event that archaeological or historical materials are discovered during project activities, work in the immediate vicinity must stop, the area would be secured, and the SHPO and the environmental project lead must be notified. Work would not commence again until the SHPO has cleared the area.

| 2. Geology and Soils | ✓ | |

**Explanation:**

- The project area is in an upland area on a basalt plain south of the Columbia River. The basalt in the floor of the plain is overlain by wind-deposited silt. The soil in the area is mostly sandy and silty loams.
- BPA will require site-specific erosion and sediment controls for soil stabilization through the use of best management practices (BMPs), hazardous material and petroleum product releases, and will follow notification procedures. During construction, any spills or leaks of hydraulic fluid or oil from construction equipment will be cleaned up to prevent spills from reaching the soil or groundwater and causing contamination. To reduce disturbance to soils and vegetation, vehicle use will be restricted to the road and or the graveled portion of the road shoulder.
- The project would require ground-disturbing activities for the installation of the 8 inch x 8 inch wood blocks or metal posts. Depth of the holes would be 41 inches deep at a 1 foot, 3 foot & 6 foot intervals throughout the length of the guardrail. This work would take place within the previously disturbed graveled shoulder of rattlesnake road. The 12-foot concrete barrier would be installed within the footprint of the road directly on the pavement. Soil erosion and sediment transport off site would be highly unlikely due the dry weather and or lack of rain in this region of Oregon and also to due to the
discrete holes limiting ground disturbing activity. The proposed action would have limited impacts to native geology and soils

3. **Plants** (including federal/state special-status species)

   **Explanation:**
   - The project disturbance area would be limited to the graveled shoulder of rattlesnake road and the paved portion of the road. Currently the proposed disturbance area is free of vegetation and not suitable for vegetation. Outside the project area vegetation is dominated mostly non-native grassland with a few scattered sagebrush and rabbit brush shrubs. No federal or state special-status plant species or their habitats were documented to occur within the project disturbance area; therefore, the proposed action would have no effect on special-status plant species, to other native or non-native vegetation.

4. **Wildlife** (including federal/state special-status species and habitats)

   **Explanation:**
   - An official federally-listed species list was requested from the U.S. Fish and Wildlife Service Information, Planning and Conservation database (IPaC) on July 27, 2017. No federally-listed or proposed listed species or their designated critical habitats under jurisdiction of the USFWS have been documented to occur within proposed project limits.
   - Typical wildlife in the area includes: the Washington ground squirrel (WGS) (Spermophilus washingtoni), white-tailed jackrabbit (Lepus townsendii), and the northern sagebrush lizard (Sceloparus graciosus graciosus). Only one special status terrestrial wildlife species has the potential to occur in the project area, the Washington ground squirrel. The WGS is a state-listed endangered species and a federal candidate species.
   - The WGS were found primarily in open, low shrub and grass habitat and also in shrubgrass and annual grassland. Project area is not suitable for the WGS as the project actions would occur within the existing road prism and approximately 50 linear feet up and down the road.
   - Additionally, field surveys from the wind farm construction (Record of Decision for the Electrical Interconnection of the Leaning Juniper II Wind Project) found no species occurrences or any suitable habitat for the state listed Washington ground squirrel (Spermophilus washingtoni) within the guardrail installation projects area. Therefore, the project would have no impact to special-status wildlife species.
   - An Endangered Species Act (ESA) Letter of No Effect for this project has been completed and provides further details.

5. **Water Bodies, Floodplains, and Fish**
   (including federal/state special-status species and ESUs)

   **Explanation:**
   - No water is present on the site. The site is in an upland location with no water present and no topographical features that could collect water.
6. **Wetlands**

**Explanation:**
- No water is present on the site. The site is in an upland location with no water present and no topographical features that could collect water. Therefore, the proposed project would not have adverse impacts to wetlands.

7. **Groundwater and Aquifers**

**Explanation:**
- Groundwater and aquifers will not be impacted by the proposed project as the project does not include any groundwater withdraws or changes to aquifer recharge areas. The proposed work is limited to the existing roadway. There would be no impacts to groundwater or aquifers.

8. **Land Use and Specially Designated Areas**

**Explanation:**
- No change in land use is proposed as part of the project. No specially designated areas were identified within the project limits. There would be no impacts to land use or specially designated areas.

9. **Visual Quality**

**Explanation:**
- The guardrail installation will not greatly alter existing visual resources in the area because it will be next to the rattlesnake road and BPA transmission tower and will occupy a small area already impacted by utility development. Impact to visual resources will be minimal.

10. **Air Quality**

**Explanation:**
- Small amounts of dust would be temporarily created by excavation activities during construction, especially during dry, windy weather. BPA requires that the construction contractor develop and implement a suitable dust abatement plan to control and minimize dust. BMPs will be used to control dust, including using water for dust control; proper storage of disturbed soils; minimizing the amount of disturbed soil at any given time. Construction vehicles and equipment will be in good running condition, minimizing emissions. Water trucks will be used for dust control.

11. **Noise**

**Explanation:**
- Construction will begin sometime the late summer or fall of 2017, and be completed in October 2017. Crews will work 8- to 12-hour days, during daylight hours, as needed to meet the schedule. There may be as many as 10 workers on site at one time but generally fewer during the construction period. Construction noise will be temporary and will cease once construction is complete. There are no residences within one mile of the substation.
12. **Human Health and Safety**

**Explanation:**

- During construction, BPA will use standard construction safety procedures to reduce the risk of fire. BPA requires that the construction contractor develop an emergency response plan that includes responding to a potential accidental fire during construction. BPA will also use standard industry traffic controls to inform motorists and manage traffic during construction activities. All equipment fueling operations will use pumps and funnels and absorbent pads. A supply of sorbent materials will be maintained on-site in the event of a spill. Response measures and procedures will be put in place in case of an accidental release of petroleum products and/or hazardous substances.

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**Evaluation of Other Integral Elements**

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.
  
  **Explanation, if necessary:**

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.
  
  **Explanation, if necessary:**

- Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.
  
  **Explanation, if necessary:**

- Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.
  
  **Explanation, if necessary:**
Landowner Notification, Involvement, or Coordination

The entire project is located within the county owned Rattlesnake Road. BPA reality specialist met with the Gilliam County lands representative and is perusing the necessary county permit(s). The county indicated high levels of support for the project.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ John Wiley

John Wiley EP –4
Physical Scientist (Environmental)

Date: August 11, 2017